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MAYOR'S OFFICE  
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MUNICIPAL BUILDING  
229 SO. SECOND STREET  
ELKHART, INDIANA 46516

July 11, 1985

EPA Region 5 Records Ctr.



248683

Mr. Arthur Gasior  
Office of Public Affairs  
U.S. E.P.A. - Region V  
230 South Dearborn Street  
Chicago, IL 60604

Subject: Proposed Superfund Program Activities at the North Main  
Street Well Field, Elkhart, Indiana

Dear Mr. Gasior:

This is to formally comment on behalf of the City of Elkhart in follow-up to the July 2, 1985 public hearing conducted by E.P.A. on the above referenced subject.

Since the TCE contamination was first discovered in April of 1981 the City has taken the following actions:

1. Installed interceptor wells to act as barriers to the further penetration of the contaminate plume into the North Main Street Well Field.
2. Operated the Bower and South Well fields to a greater extent than normal so as to ease stresses on the North Main street well field that might lead to further contamination.
3. Operated North Main Street on a strategy whereby the 6 highly contaminated wells are not operated and the remaining 9 wells with the trace level contamination are operated in such an order as to minimize the TCE level in the finished level.
4. The City has made every effort to cooperate by supplying information and support personal to E.P.A. as the lead agency.

In spite of the actions listed above by the City of Elkhart to mitigate further risk to public health through this water supply to 70% of our City the extent of the well field contamination both in number of wells effected and concentration in the finished water has worsened over the 4 years since the problem was discovered. Through the City Engineer Gary Gilot's letter of

January 22, 1985 to Mike Strimbu the E.P.A. Superfund Coordinator on this project and also through my June 6, 1985 letter to Mr. Valdus V. Adamkus, Regional Administrator of E.P.A. the City of Elkhart has itemized its short term and long term goals relating to the North Main Street Well Field and a safe public water supply for the City of Elkhart now and in the future. The short term needs identified by the City were the E.P.A.'s assistance through Superfund and the following:

1. To regain the lost capacity at the North Main Street Well Field to date approximately 6 million gallons per day of capacity has been rendered unusable by the TCE contamination.
2. Provide safe drinking water quality with TCE levels below the acceptable lifetime exposure level or in our opinion as close to 0 concentration as possible.
3. Initiating a removal or containment of grossly contaminated soil at the identified sources to the east of the well field.

Our longer term goals are an expanded scope of investigation to include potential sources from the west of the well field under the E.P.A.'s remedial investigation feasibility study and also the City recognizes the need to pursue exploration and development of a new well field to provide for future capacity needs for the economic growth of Elkhart and the future health of its residents.

You will also note that on October 23, 1984, I first requested that E.P.A. give consideration to expanding the scope of their investigation in Elkhart to move toward a comprehensive solution that would take into account the multitude of groundwater contamination problems throughout the City of Elkhart or its immediate environs. As we are all aware, by now the list of groundwater contamination problems is growing rather than shrinking in the Elkhart area and E.P.A. has in fact made this commitment to a comprehensive approach to evaluating the problem and implementing a long term solution. We appreciate the responsiveness on the part of E.P.A.

We believe that the E.P.A.'s proposed actions outlined in the phased feasibility study and presented at the public hearing on July 2, 1985, concurrent with separate E.P.A. initiatives to begin containment or removal of grossly contaminated soil in the vicinity of the well field will result in the City of Elkhart's short term goals for a safe public water supply being met. We have drawn attention to the fact that there are some similarities between the problem with the North Main Street Well Field in Elkhart, Indiana and the well field contamination at Battle Creek (i.e. Verona), Michigan. It is my understanding that this course of action is an interim solution to provide for public safety and minimize further damage to the well field prior to moving on with

the inherently longer term hydrogeological investigation of the area pursuant to a final long term solution to the problem. We want to go on record as being strongly supportive of this approach to solving this contamination problem in the City of Elkhart. We have consistently maintained that we are concerned with addressing the public health issues first and the identification of sources and cost recovery are important but these are secondary to the public health considerations.

We want to acknowledge on behalf of the citizens of Elkhart the tremendous efforts that have been put forth by the Emergency Response and Remedial Action Sections of the Superfund Branch of E.P.A. - Region V. The project coordinators as well as consultants assigned to this project have demonstrated the highest level of professionalism as well as an element that is very much appreciated - - some empathy for the citizens of Elkhart. They have been appreciated for their technical skills first but it is certainly a plus to have assistance from a Federal branch of government from individuals who can also relate to the people side of problems. On behalf of the citizens of Elkhart we want to thank you for your efforts to date and go on record in support of implementation of the plans recommended through the phased feasibility study and the presentation on July 2, 1985.

Sincerely,

CITY OF ELKHART



James P. Perron, Mayor

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